RiverStone Partners E Rate Consulting

JAN 2 9 2007
FCC - MAILROOM

January 23, 2007

Federal Communications Commission Office of the Secretary 445 12th Street, SW Room TW-A325 Washington, DC 20554

Subject: Appeal of USAC Funding Decision - Docket 02-6

Request for Review

Green Chimneys School submits the following Request for Review by the FCC of a funding denial decision issued by USAC.

The attached appeal document outlines the reasons for the USAC decision and the issues Green Chimneys would like the FCC to consider.

A letter of authorization from Green Chimneys is attached.

Sincerely,

Robert Sniecinski RiverStone Partners, LLC 106 Lilac Drive Annandale, NJ 08801 908 735 6986 908 735 2839 fax

E mail: erate@earthlink.net

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Green Chimneys School

400 Doansburg Rd. - Box 719 * Brewster, NY 10509-0719 * www.greenchimneys.org Phone: (845) 279-2995 * (718) 892-6810 * (203) 797-8320 * Fax: (845) 279-3077

Joseph Whalen Executive Director

January 16, 2006

To Whom It May Concern:

Please accept this letter as authorization for Ron Krauss, our Purchasing Agent to act on behalf of the Green Chimneys School for all matters relating to submissions, supporting documentation, contract negotiations, etc. regarding our E-Rate Program applications. In addition, we also authorize RiverStone Partners, LLC and Robert Sniecinski, President to act on behalf of the Green Chimneys School in the same above-mentioned matters.

Should you need any additional information, please let me know.

ı manğık you,

Deborah Moore, Principal Green Chimneys School

PO Box 719

Brewster, NY 10509



Green Chimneys School

Request for Review

Docket No. 02-6

USAC Denial of Green Chimneys Appeal Dated December 1, 2006

Funding Year 2006

Appeal Date January 23, 2007

Appellant Name: Green Chimneys School

Applicant BEN: 10803

Application Numbers: 520286, all FRNs.

Service Providers:

CDW-G SPIN 143005588

American Business Communications SPIN 143027269

Summary:

Green Chimneys filed an appeal with USAC on October 13, 2006 following the denial of the above application for "This funding request is denied as a result of a Cost Effective Review, which has determined that your request for Internal Connections/Basic Maintenance of IC has not been justified as cost effective as required by FCC rules".

<u>Summary of USAC Appeal Denial Reasons – See USAC Appeal Denial Letter</u> <u>Attached</u>

- 1 Excessive amounts of equipment for a facility the size of Green Chimneys.
- 2 The maintenance cost per drop is very high.
- 3 USAC only referenced two Special Circumstances Green Chimneys is located in a Rural County and only received one bid. <u>There are other Special Circumstances that were provided in the appeal which were not considered.</u>

Green Chimneys requests an FCC review/waiver of this denial decision.

Green Chimneys Issues:

The issues we would like the FCC to consider in this request are:

- 1 Green Chimneys provided more than the two special circumstances justifying the cost of equipment, maintenance and cabling than those identified by USAC in their denial. Green Chimneys believes these additional special circumstances were not considered in the USAC decision. Please see the attached appeal submitted to USAC on October 13, 2006 and the response provided to the cost effective reviewer on July 3, 2006. It appears that the site map and needs analysis were never considered in the decision attachments A and B in the response to the initial request for information.
- 2 The initial cost effective reviewer requested a great deal of disconnected information. A response was provided to each individual question but Green Chimneys was not given an opportunity to provide any clarification to the individual responses. There was no follow up on the part of the reviewer. When asked for clarification on the guidelines for a cost effective review we were directed to the web site. Please see USAC Appeal documents attachment C.
- 3 Reviewer did not provide any assistance as referenced in the USAC guidelines. "If you have any questions please contact the USAC reviewer. When the reviewer was contacted Green Chimneys was told "we ask the questions and you provide the answers". Reviewer directed GC to USAC web site which provided no information regarding cost effective reviews. Please see USAC appeal document attachment C.
- 4 The cost effective review request for information has changed. The cost effective review document received by Green Chimneys on July 3, 2006 did not include any examples. More recent requests for information relating to cost effective reviews provides examples that benefit the applicant. Green Chimneys did not have the benefit of these examples.
- 5 The Academia Order clearly states that the "Commission rules, however, do not expressly establish a bright line test for what is a cost effective service."

If there is not bright line test, the cost effective reviewer did not consider all the documentation, no follow up opportunity was provided to Green Chimneys to clarify information and current applicants undergoing a cost effective review are provided the benefit of examples in the review questions, it appears that Green Chimneys was at an extreme disadvantage in complying with the cost effective review.

Green Chimneys believes that they have meet two of the four circumstances that qualify for a granting/reconsideration of this request. (Circumstance 1) When the appeal makes clear that USAC erred in its initial review. (Circumstance 4) When USAC obtains policy

clarification or new policies between the time of the funding commitment and the appeal decision. Appeals procedure guidelines attached.

For these reasons we request that the FCC remand this decision back to USAC for further review.



Universal Service Administrative Company

Schools & Libraries Division

Administrator's Decision on Appeal - Funding Year 2006-2007

December 01, 2006

Robert Sniecinski RiverStone Partners, LLC 106 Lilac Drive Annandale, NJ 08801

Re: Applicant Name:

GREEN CHIMNEYS SCHOOL

Billed Entity Number:

10803

Form 471 Application Number:

520286

Funding Request Number(s):

1432143, 1432150, 1432157, 1432166, 1432172

Your Correspondence Dated:

October 13, 2006

After thorough review and investigation of all relevant facts, the Schools and Libraries Division (SLD) of the Universal Service Administrative Company (USAC) has made its decision in regard to your appeal of USAC's Funding Year 2006 Funding Commitment Decision Letter for the Application Number indicated above. This letter explains the basis of USAC's decision. The date of this letter begins the 60 day time period for appealing this decision to the Federal Communications Commission (FCC). If your Letter of Appeal included more than one Application Number, please note that you will receive a separate letter for each application.

<u>Funding Request Number(s)</u>:

1432143, 1432150, 1432157, 1432166, 1432172

Decision on Appeal:

Denied

Explanation:

• Upon thorough review of the appeal letter and the relevant documentation, USAC has reviewed and assessed your appeal and has determined that the funding request was properly evaluated. During Initial Review, you were asked to provide detail on services and products you requested. Based on the documentation submitted in response, you were given an additional opportunity to provide detail justifying the cost effectiveness of the requested services and products. Based on the documentation submitted during Initial Review, USAC has determined that the requests include excessive amounts of equipment for a facility (students and staff) the size of Green Chimneys School. Additionally, the maintenance cost per drop is very high. During Initial Review, USAC also asked you if there were any special circumstances we should be aware of that were taken into consideration for purposes of calculating the cost of these services. In your response, you stated

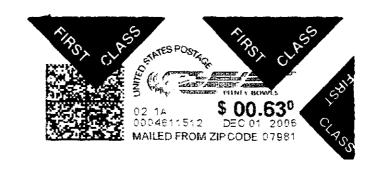
Green Chimneys is located in a rural county in upstate New York, and had only received one bid and that the pricing of other service providers is noncompetitive. This response does not justify the costs associated with these funding requests. As is noted on USAC's website,

http://www.universalservice.org/_res/documents/sl/html/SL-newsbrief-20060331.aspx, FCC rules require that requested products and services are cost effective. You have failed to provide evidence that USAC erred in its initial decision. Consequently, the appeal is denied.

If your appeal has been approved, but funding has been reduced or denied, you may appeal these decisions to either USAC or the FCC. For appeals that have been denied in full, partially approved, dismissed, or canceled, you may file an appeal with the FCC. You should refer to CC Docket No. 02-6 on the first page of your appeal to the FCC. Your appeal must be received or postmarked within 60 days of the date on this letter. Failure to meet this requirement will result in automatic dismissal of your appeal. If you are submitting your appeal via United States Postal Service, send to: FCC, Office of the Secretary, 445 12th Street SW, Washington, DC 20554. Further information and options for filing an appeal directly with the FCC can be found in the "Appeals Procedure" posted in the Reference Area of the SLD section of the USAC website or by contacting the Client Service Bureau. We strongly recommend that you use the electronic filing options.

We thank you for your continued support, patience and cooperation during the appeal process.

Schools and Libraries Division Universal Service Administrative Company Ron Krauss Green Chimneys School 400 Doansburg Road P.O. Box 719 Brewster, NY 10509



Billed Entity Number:

10803

Form 471 Application Number:

520286

Form 486 Application Number:

RiverStone Partners, LLC E rate Consulting

October 13, 2006

Letter of Appeal Schools and Libraries Division – Correspondence Unit 100 South Jefferson Road PO Box 902 Whippany, NJ 07981

Subject: Appeal of Funding Commitment Decision – Application 520286

This is an appeal of a funding denial decision for cost effectiveness dated August 15, 2006 for Green Chimneys School.

We believe this decision is in fact discrimination against special needs students and the decision making process is seriously flawed. Green Chimneys is a school for special needs students, from discussions with other schools that provide similar services within the State it appears special needs schools are being targeted for these cost effective reviews. By their very nature special needs schools are not cost effective on a per student basis, but are required by Federal Legislation to provide educational alternatives to those in need. Special needs schools typically have a low student count, however, the administrative functions and the technology support provided by the E rate program remain constant and are required for the students to receive the type of educational support they deserve. Using the student count and the requested E rate funding as a metric to target these schools appears discriminatory.

The direction and assistance provided by USAC to complete a cost effective review is, at best, minimal compared to the directions for a PIA review or a selective review. Directions to comply with these reviews are extensive and readily available on the USAC website. This is not true for a cost effective review. Please see the enclosed directions provided by the cost effective reviewer when Green Chimneys asked for assistance.

Green Chimneys does not have the luxury to hire staff to handle all the administrative requirements imposed by the E rate program. This luxury may be in the budget for the public sector but is not cost effective for our school. Special needs schools invest in staff to support the needs of their students not the support of the administrative load imposed by the E rate program. As you will see in the attached documentation we followed all the directions provided to us by USAC for the cost effective review. Based on comparative pricing and the USAC two in five rules, Green Chimneys believes these are fair and competitive prices for our technology needs.

Additionally, the cost effective review process appears flawed. It is clearly stated in the FCC Academia Order (attached) that, "The Commission rules, however, do not expressly establish a bright line test for what is a "cost effective service". In the absence of these rules it is difficult to understand how an objective decision can be made relative to the issue of cost effectiveness. E rate is a rules based program designed to provide consistency and fairness in the decision making process for all applicants, if there are no clear rules how can there be any consistency in the review process across applications. If there are no clear directions for the applicants it places an unnecessary load on the school administration to understand what is required. This looks like "send me what you have and I'll let you know if you are right". In all other reviews there is an opportunity for some type of dialogue for clarification between the reviewer and the applicant. When the reviewer was contacted for help in the review process we were told, "this is how it works, we ask the questions you provide the answers". Is this really the type of help the FCC intended to provide applicants when they established the E rate program?

Had our prior years applications been reviewed and a decision made in a timely manner our current year funding request would have been dramatically reduced. If you sincerely believe that we are asking for funding that is not cost effective we would happy to meet with you to resolve this issue.

We intend to contact the Office of Senator Hillary Clinton requesting her assistance in this matter.

A Letter of Agency from Green Chimneys School is attached.

Sincerely,

Robert Sniecinski President RiverStone Partners, LLC Phone: 908 735 6986 Fax: 908 735 2839

E mail: erate@earthlink.net

Copy: FCC

Attachments:
LOA
Appeal Document
Cost Effective Review Submission
Cost Effective Review Directions from Reviewer

Academia Order

Green Chimneys School

Appeal of USAC Decision

Funding Commitment Decision Letter dated August 15, 2006

Funding Year 2006

Appeal Date October 13, 2006

Appellant Name: Green Chimneys School

Applicant BEN: 10803

Application Numbers: 520286, all FRNs.

Service Providers:

CDW-G SPIN 143005588

American Business Communications SPIN 143027269

Appeal of USAC Decision: This funding request is denied as a result of a Cost Effective Review, which has determined that your request for Internal Connections/Basic Maintenance of IC has not been justified as cost effective as required by FCC rules.

According to the FCC Order dated August 15, 2006 (the Academia Order), specifically footnote 29, "The commission rules, however, do not expressly establish a bright line test for what is a "cost effective service"." It is difficult to understand how the FCC/USAC can deny an application for not being cost effective when there have not been rules/tests established for determining what is a cost effective service.

On the USAC website there are clear rules and guidelines for the E rate application process, the selective review process and completing all forms necessary to comply with the Eate program. However, there are no clear rules or guidelines for a cost effective review. E rate is a rules based program. It is difficult to comply when there are no documented rules.

Special Needs Students

Chimneys School is a Chapter 853 School chartered by the NY State Education Department to provide educational, vocational and independent living skills to children referred by multiple state, city and county agencies. The children present multiple handicapping conditions: autism, emotional and behavioral disturbance, mental illness and retardation, sexual and emotional abuse and neglect. In addition, the recently enacted NCLB (No Child Left Behind) legislation has dramatically increased the educational requirements in all schools. For some very difficult children, the school also employs 1:1 aides that accompany the individual student throughout the school day. At times as many as 15 – 20 students require this level of support. As such, the school employs a very large number of staff thus creating a high staff to student ratio, sometimes as high as 1:1. Green Chimneys is located in a rural part of Putnam County and does not typically receive multiple bids for the services required to keep the school technologically competitive.

Additionally, the Green Chimneys campus consists of multiple buildings that require communications capabilities. The costs to provide technology to these buildings is typically higher than for a school that in housed in only one building.

Green Chimneys School is located in Putman County New York. The school was established in 1947 offering an educational alternative to children with special needs. The school consists of 28 buildings that have been converted from a farm into a unique educational environment. Green Chimneys has the capacity to accommodate 196 students and due to the special needs of the students employs a staff of 250. Both the staff and the students require the technology afforded by the E rate program.

The funding from our E rate application was to be used to upgrade and maintain our communications system that goes down on a monthly basis. As you are aware technology plays an important part in helping student learn and apply the basic skills and information necessary to contribute in our society. Without this technology our special needs students will only fall farther behind.

For additional information on the school please see our attached Cost Effective Response and the enclosed brochure on Green Chimneys School.

Special Circumstances

FRN 1432143 – Service Provider – CDW-G

Green Chimneys is a unique educational alternative for special needs students. There is currently a shortage of these types of educational institutions. Green Chimneys is currently working with the State of New York on expansion plans to offer this alternative educational environment to

a larger population. This FRN is structured to take into account this expansion. It is more cost effective to install this technology one time than to upgrade on an annual basis. In addition the 2 in 5 rule will only allow funding for internal connections twice in 5 years. In order to keep costs low, Green Chimneys planned on doing the actual installation with internal staff.

FRN 1432150 – American Business Communications – Toshiba Phone System

The current phone system goes down on almost a weekly basis. Obviously the current system is in urgent need of replacement and modernization. The proposed phone system has the capacity to handle up to 436 phones. As mentioned in the response above Green Chimneys is working on expansion plans. This FRN is designed to handle this expansion. Installing this system now is more cost effective than upgrading at a future time. Also, taken into consideration is the USAC 2 in 5 restriction. Upgrading now is more cost effective than doing it in stages over the coming years.

FRN 1432157 - American Business Communications - Cabling

The current Green Chimneys educational facilities were originally a farm in rural Upstate New York. The farm is over 100 years old with 28 buildings. Many of the original buildings are used for educational purposes. Installing new cable between these 28 buildings is a major challenge. Please see the enclosed site map submitted with the original cost effective review material.

This FRN was structured taking into account the worst case scenario. It is unknown what will be encountered when digging trenches for the cabling. We anticipated digging through existing asphalt and concrete and encountering old water lines, discarded farm material and other unanticipated problems such as previously installed utilities which would be beyond any standard costs for installing cabling in a more known environment.

In addition the cabling in the buildings themselves requires new wiring as well as wall mounts. Weather and special drainage conditions also played a part in the structuring and cost of this work.

FRN 1432166 - American Business Communications - Basic Maintenance - Cabling

Please see response to FRN 143257.

FRN 1432172 – American Business Communications – Basic Maintenance – Phone System

Please see response to FRN 1432150.

Compliance with USAC instructions

As stated earlier, according to the FCC Order dated August 15, 2006, specifically footnote 29, "The commission rules, however, do not expressly establish a bright line test for what is a "cost effective service"." It is difficult to understand how the FCC/USAC can deny an application for not being cost effective when there have not been rules/tests established for determining what is a cost effective service.

However, Green Chimneys did comply with the directions provided by the USAC reviewer (see attachment A).

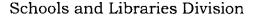
Green Chimneys validated the prices quoted for each FRN by comparing them with previous quotes from other service providers from prior funding years and validated the prices as being cost effective for the school by comparing them with commercial pricing available on various web sites.

Green Chimneys respectfully requests that the denial be reconsidered based on the information provided.

CC: FCC

Attachments:

- 1 Directions from USAC Reviewer
- 2 Academia Order
- 3 Cost Effective Submission by Green Chimneys





Date: 7/3/2006

Dear: Ron Krauss

Applicant Name: GREEN CHIMNEYS SCHOOL

Contact Phone Number: (845) 2792995

Application Number: 520286

Response Due Date: July 3, 2006

As we discussed in our conversation, we are in the process of reviewing all Funding Year 2006 Form 471 applications for schools and libraries discounts to ensure that they are in compliance with the rules of the Universal Service program. I am currently in the process of reviewing your Funding Year 2006 Form 471 Application. To complete my review I need some additional information. The information needed to complete the PIA Review is listed below.

Questions:

Review of your below mentioned Form 471 application raises significant questions about whether Internal Connections and Basic Maintenance of IC funding requests are cost effective as required by FCC rules. You have submitted application # 520286 for Internal Connections and Basic Maintenance of IC for a total of \$595,626.10, FRN 1432143 (\$153,951.10 - CDW-G), FRN 1432150 (\$121,050.00 - American Business Co), FRN 1432157 (\$256,500.00 - American Business Co) and Basic maintenance of IC for FRN 1432166 (\$64,125.00 - American Business Co) for 1 school (170 students).

Based on information before us at this time, we are unable to make a positive determination that these funding requests are cost effective as required by FCC rules. However, we are affording you an opportunity to submit further information that would justify these requests. A favorable determination requires that we have a full understanding of the specific services to be provided for the amounts requested, and a justification that establishes that the funding requests are cost effective. The information needed to complete this evaluation is as follows.

Green Chimneys School Overview:

Chimneys School is a Chapter 853 School chartered by the NY State Education Department to provide educational, vocational and independent living skills to children referred by multiple state, city and county agencies. The children present multiple handicapping conditions: autism, emotional and behavioral disturbance, mental illness and retardation, sexual and emotional abuse and neglect. In addition, the recently enacted NCLB (No Child Left Behind) legislation has dramatically increased the educational requirements in all schools. For some very difficult children, the school also employs 1:1 aides that accompany the individual student throughout the school day. At times as many as 15 – 20 students require this level of support. As such, the school





large number of staff thus creating a high staff to student ratio, sometimes as high as 1:1. Green Chimneys is located in a rural part of Putnam County and does not typically receive multiple bids for the services required to keep the school technologically competitive.

Additionally, the Green Chimneys campus consists of multiple buildings that require communications capabilities. The costs to provide technology to these buildings is typically higher that for a school that in housed in only one building.

The question of cost effectiveness as defined by the March 31, 2006 SL NewsBrief is: In evaluating bids from prospective service providers, applicants must select the <u>most cost-effective offering</u> from the bids received. In other words, the winning bid must be the most competitive of those received. In addition to this requirement, the selected bid must itself be cost-effective compared to prices available commercially. Specific pricing information is available on the Internet. A number of Internet sources cover comparative pricing information for technology products, so you can gauge market prices. You might also want to check with other school districts or libraries as a yardstick for what's reasonable. As an example, in the <u>Ysleta Order</u> (FCC 03-313), the FCC states that components "at prices two or three times greater than the prices available from commercial vendors would not be cost effective, absent extenuating circumstances."

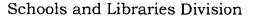
After several calls to USAC customer service and USAC in Washington, Green Chimneys is interpreting this to mean "how do we know we received a commercially competitive price". If this is the wrong interpretation please let us know and we will modify our response.

USAC also mentioned that an upcoming USAC NewsBrief covering tips for cost effective reviews will be issued shortly. Green Chimneys may need to submit a modified/clarified response based on the information contained in this document.

1- Review of FRN 1432143 in the amount of \$153,951.10 for Internal Connections

➤ Upon review of your item 21 documentation, you are requesting 300 licenses for Microsoft Academic W2003 at a cost of \$1,950.00, is this appropriate and cost effective for a school with only 170 students?

This FRN takes into account the fact that Green Chimneys has a capacity to accommodate up to 196 students and has a staff of 250. The FRN includes the additional students and current staff. Green chimneys currently has 280 computers connected. Green Chimneys had this service requirement out to bid in previous years. The price quoted is competitive to these previous bids. Additionally, Green Chimneys has validated, using web based technology, the fairness of this price quote.







w of your item 21 documentation, you are requesting 300 licenses for Microsoft Academic Exchange W2003 at a cost of \$1,020.00, is this appropriate and cost effective for a school with only 170 students?

This FRN takes into account the fact that Green Chimneys has a capacity to accommodate up to 196 students and has a staff of 250. The FRN includes the additional students and current staff. Green chimneys currently has 280 computers connected. Green Chimneys had this service requirement out to bid in previous years. The price quoted is competitive to these previous bids. Additionally, Green Chimneys has validated, using web based technology, the fairness of this price quote.

➤ Upon review of your item 21 documentation, you are requesting 300 licenses for Microsoft Academic Sys Mgt Config W2003 at a cost of \$2,775.00, is this appropriate and cost effective for a school with only 170 students?

This FRN takes into account the fact that Green Chimneys has a capacity to accommodate up to 196 students and has a staff of 250. The FRN includes the additional students and current staff. Green chimneys currently has 280 computers connected. Green Chimneys had this service requirement out to bid in previous years. The price quoted is competitive to these previous bids. Additionally, Green Chimneys has validated, using web based technology, the fairness of this price quote.

➤ Why are (16) Cisco 3750 switches appropriate and cost effective for a school with only 170 students?

This FRN takes into account the fact that Green Chimneys has a capacity to accommodate up to 196 students and has a staff of 250. The FRN includes the additional students and current staff. Green chimneys currently has 280 computers connected. Green Chimneys had this service requirement out to bid in previous years. The price quoted is competitive to these previous bids. Additionally, Green Chimneys has validated, using web based technology, the fairness of this price quote.

2- Review of FRN 1432150 in the amount of \$121,050.00 for Internal Connections

➤ Upon review of your item 21 documentation, there are 2 different price entries for this FRN. The 1st price entry is at cost and the 2nd price entry is price/unit. Why are the dollars requested for this FRN using a higher cost structure in support rather than the lower cost structure as would the preferred cost. Please provide rationale and justification as to the cost effectiveness for a student population of 170.



documentation includes both the supplier cost and the price/unit charged to the school. These prices are well within the Ysleta Order.

> Upon review of your item 21 documentation, you are requesting 109 licenses for 4-port CO Line/Station at a cost of \$12,262.50, is this appropriate and cost effective for a school with only 170 students?

This FRN takes into account the fact that Green Chimneys has a capacity to accommodate up to 196 students and has a staff of 250. The FRN includes the additional students and current staff. Green Chimneys had this service requirement out to bid in previous years. The price quoted is competitive to these previous bids. Additionally, Green Chimneys has validated, using web based technology, the fairness of this price quote.

This FRN is capable of supporting 436 phones for both staff and student needs.

3 -Review of FRN 1432157 in the amount of \$256,500.00 for Internal Connections

> Upon review of your item 21 documentation, the description references Inter-Building cabling, there are 7 buildings identified in the item 21. Please provide the names of the buildings and the purpose of each building in relation to this FRN.

Please see attached spreadsheet.

There are 122 cable drops and 40 voice cable drops in this FRN. Please provide where these cable drops are located, quantity per building and cable drops per classroom within each building.

Please see attached spreadsheet.

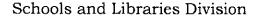
For the patch (15) 48 port patch panels requested, where will these be located? There are a total of 720 ports requested. Please provide rational and justification for the cost effectiveness for a population of 170 students.

Please see attached spreadsheet and previous response relative to the number of students.

For the (15), Wall Mount Voice Distribution panels, where will these panels be located. Please provide the following additional information on these panels:

EACH WALL MOUNT DISTRIBUTION PANEL CONSISTS OF THE FOLLOWING COMPONENTS:

MA





KE: ICC MODEL: IC110H1104 IC110 HINGED KIT

2- MAKE: ICC MODEL: IC110CMBWF CABLE MANAGEMENT WITH FEET

1- MAKE: ICC MODEL: ICMPP024T8 24-PORT 8-COND, WECO TELCO PANEL

Please see attached spreadsheet for panel locations.

➤ For the (15), Oven racks, where will these racks be located? Please provide the following additional information on these racks:

EACH OVEN RACK CONSISTS OF THE FOLLOWING COMPONENTS:

1- MAKE: ICC MODEL: ICCMSSGR22 SWING GATE RACK, 19" X 18", 20RMS

2- MAKE ICC MODEL: ICCMSCMA52 CABLE MANAGEMENT INTERBAY PANELS

1- MAKE: ICC MODEL: ICCMSRDV20 VENTED RACK SHELVES 20"

1- MAKE: ICC MODEL: ICACSGKS00 GROUNDING KIT

Please see attached spreadsheet for panel locations.

➤ How many feet of 50 pair Inter-Building cabling is needed to connect the buildings referenced in item 21?

Please see attached spreadsheet.

➤ How many feet of Fiber-Optic Inter-Building cabling is needed to connect the 5 buildings referenced in item 21?

Please see attached spreadsheet.

> How many feet of conduit is needed for the cabling of buildings?

Please see attached spreadsheet.

4 - Review of FRN 1432166 in the amount of \$64,125.00 for Basic Maintenance of IC

➤ Upon review of your item 21 documentation, this request is for basic maintenance of IC for Wire and Cable Maintenance of 18 buildings. Please provide the names of the 18 buildings and the purpose of each building in relation to this FRN.

Please see attached spreadsheet. Also, additional buildings wired previously (including #5 – Business Office; #6 – Executive Offices; #18 – Vocational Classroom).





provide a list of equipment that will be supported by the basic maintenance on wire and cable maintenance. Provide the make and model of each piece of equipment within the 18 buildings. Provide a task list and cost per task per building for the dollar amount requested in funding of this FRN.

The FRN is for wire and cable maintenance not hardware.

5 - Review of FRN 1432172 in the amount of \$30,300.00 for Basic Maintenance of IC

➤ Upon review of your item 21 documentation, this request is for Basic maintenance of IC for a PBX telephone system and indicates that these services will support 27 buildings in the Brewster campus. Please provide the names of the 27 buildings and the purpose of each building in relation to this FRN.

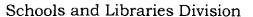
Please see our Campus Site Plan attached.

➤ Please state the FRN number and make and model of this PBX and provide a component list for the PBX.

FRN # 1432172 from the initial cost effective request. See Above.

TOSHIBA CTX670 TELEPHONE SYSTEM CONFIGURED 50 TRUNKS AND 400 EXTENSIONS WITH 24 PORT TOSHIBA VOICE MAIL SYSTEM.

- 6- 208/240 VAC POWER CORD
- 1- CIX670 R4.X EXPANSION PROCESSOR FOR BCTU2A
- 1- PAGING RELAY CONTROL & MOH INTERFACE UNIT
- 1- ISDN PRIMARY RATE INTERFACE UNIT
- 2- 3-OUTLET 240 VAC POWER STRIP RACK MOUNT
- 30- 8 CIRCUIT STANDARD TELEPHONE INTERFACE WITH MW
- 10- 16 CIRCUIT DIGITAL STATION INTERFACE UNIT
- 1- CIX670 RACK MOUNT BASIC SYSTEM PACKAGE
- 1- RACK MOUNT BASE CABINET WITH POWER SUPPLY
- 1- CIX670 RACK MOUNT BASIC RELEASE 4.X PROCESSOR
- 1- MAINTENANCE MODEM
- 5- CIX670 RACK MOUNT EXPANSION CABINET WITH POWER SUPPLY
- 109- 4-PORT CO/LINE/STATION LICENSE FOR STRATA CIX/CTX SYSTEMS
- 6- 4-CIRCUIT ANALOG LOOP START CO LINE INTERFACE SUBASSEMBLY
- 7- 4-CIRCUIT ANALOG LOOP START CO LINE INTERFACE UNIT
- 1- ISDN PRI CABLE KIT WITH FERRITE CORE
- 1- STRATEGY IES32 WITH 24 PORT UM/FAX PLUS CABLE







de a task list per component of the PBX and associated cost per task for this FRN.

MANAGE AND RESPOND TO ALL CLIENT TELEPHONY RELATED BASIC MAINTENANCE AND TROUBLE REPORTS. REPAIR AND REPLACE DEFECTIVE EQUIPMENT AS REQUIRED. THIS SERVICE IS FOR TOSHIBA CTX 670 TELEPHONE SYSTEM WITH 50 TRUNKS, 400 STATIONS AND 24 PORT VOICE MAIL SYSTEM LOCATED THROUGHOUT A LARGE MULTI BUILDING SCHOOL CAMPUS ENVIRONMENT.

Please provide any special circumstance, rationale, or justification that we should be aware of that would validate your funding request as cost effective.

As stated earlier, Green Chimneys is located in rural Putnam county in upstate New York. Green Chimneys only received one bid. However, the school has had experience with other service providers in the area and found their pricing and quality of service to be non competitive for similar services. The pricing from the service providers identified in the e rate application was compared to these previous bids from earlier years and pricing available on the web.

➤ Please provide a description of how you chose your service provider as a cost effective source for the services requested

Please see previous response.

Please fax or e-mail the requested information to my attention. If you have any questions, please feel free to contact me.

It is important that we receive all of the information requested within 15 calendar days so we can complete our review. Failure to do so may result in a reduction or denial of funding. If you need additional time to prepare your response, please let me know as soon as possible. If you are unable to provide the requested information because your school has closed or will shortly close for summer break, let me know when you will be available to respond to these questions.

Please advise me if the Contact Person on the application(s) has changed from that on the original application. This change must include the Form 471 application number(s) and be signed by the original application's Contact Person, the original application's Authorized Person or a school official (with name and title provided).

Schools and Libraries Division

Shou ld

you

wish to cancel your Form 471 application(s), or any of your individual funding requests, please clearly indicate in your response that it is your intention to cancel an application or funding request(s). Include in any cancellation request the Form 471 application number(s) and/or funding request number(s), and the complete name, title and signature of the authorized individual.

Date Sent: 7/3/2006

Date due for items requested: 7/18/2006

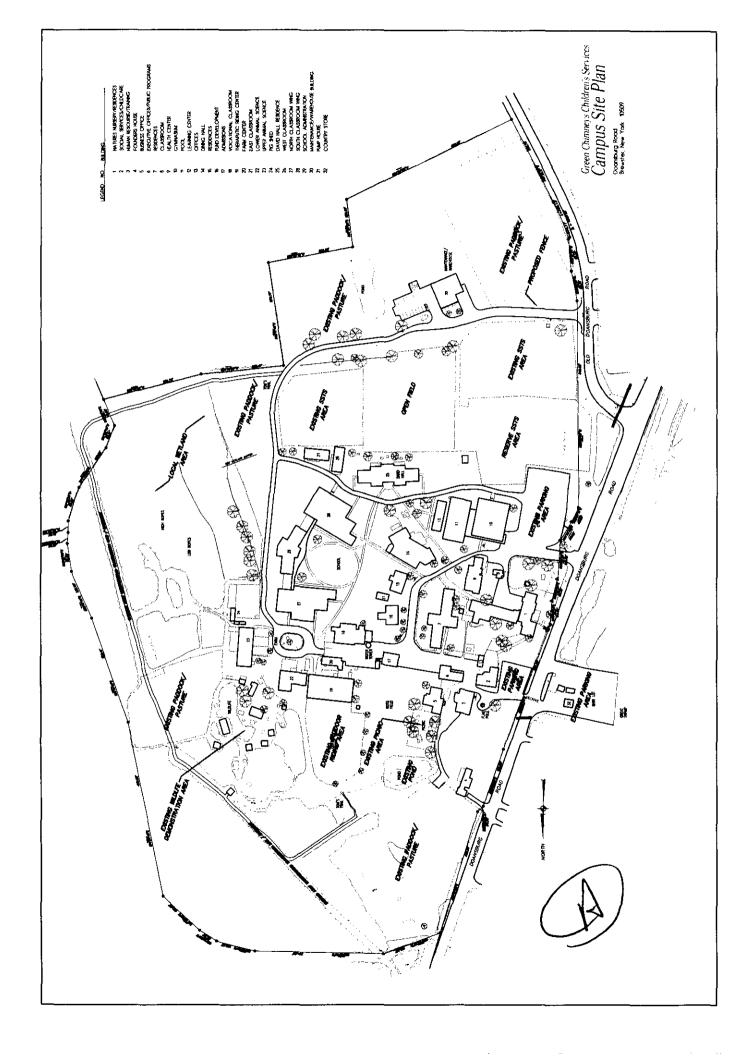
Thank you for cooperation and continued support of the Universal Service Program.

Sincerely,

Michael Capps Schools and Libraries Division Program Integrity Assurance

Phone: 973-581-5030 FAX: 973-599-6578

e-mail address mcapps@sl.universalservice.org



Green Chimneys School - 2006/2007 E-Rate Needs

	Bldg #	Length in feet	Oven Rack/ Patch Panel	12P 3750G- 12S	24P 3750- 24TS	24P 3750G- 24TS-1U	48P 3750- 48TS	Data Drops	Phone Drops
Fibre Runs (6 Strand) and 50 Pair (DB) in (3) underground 4" SCH40 conduits):									
	Bidg 3 to Bidg 17	250							
	Bidg 3 to Bidg 19	400							
	Bldg 3 to Bldg 20	400							
	Bidg 3 to Bidg 22	500							
	Bldg 3 to Bldg 23	600							
	Bldg 3 to Bldg 27	800							
	Total feet	2950							
Internal Wiring Cat6:									
Learning Center	12							8	
Admissions	17							14	7
Theraputic Riding Center	19							4	4
Farm Sciences	20							16	8
Animal Sciences - Lower	22							2	2
Animal Sciences - Upper	23							14	7
David Hall	25							24	12
School North Wing	27							20	
School South Wing	28							20	
Switches:									
Health Center	9		1		1				
Gym	10		1	,	1		•		
Pool	11		1		1				
Learning Center	12		1		1				
Dining Hall	14		1		1				
Fund Development	16		1		11				
Admissions	17		1		1				
Theraputic Riding Center	19		1		1				
Farm Sciences	20		1		1				
Animal Sciences - Lower			1		1				
Animal Sciences - Upper			1		1				
David Hall	25		1			1			
School North Wing	27		1				1		
School South Wing	28		1				1		
School Admin Wing	29		1	11			1		
	Totals		15	1	11	1	3	122	40

